

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

	X	
	:	
SECURITIES EXCHANGE COMMISSION,	:	No. 19 Civ. 1459 (LAP)
	:	
Plaintiff,	:	
	:	
v.	:	
	:	
JOSHUA SASON, MARC MANUEL, KAUTILYA	:	
(a/k/a TONY) SHARMA, PERIAN SALVIOLA,	:	
MAGNA MANAGEMENT, LLC (f/k/a MAGNA	:	
GROUP, LLC), MAGNA EQUITIES II, LLC (f/k/a	:	
HANOVER HOLDINGS I, LLC), MG PARTNERS,	:	
LTD., AND PALLAS HOLDINGS, LLC,	:	
	:	
Defendants.		

**NOTICE OF MOTION TO DISMISS**

PLEASE TAKE NOTICE that, pursuant to Rules 12(b)(6) and 9(b) of the Federal Rules of Civil Procedure, the accompanying Memorandum of Law, the Affirmation of Marjorie J. Pearce, and upon the pleadings and all prior proceedings in this action, Defendants Joshua Sason, Marc Manuel, Magna Management, LLC (f/k/a Magna Group, LLC), Magna Equities II, LLC (f/k/a Hanover Holdings I, LLC), and MG Partners, Ltd. (collectively, “Magna Defendants”) will move before the Honorable Loretta A. Preska, United States District Judge for the Southern District of New York, at the United States Courthouse, 500 Pearl Street, New York, New York, 10007, at a date and time to be determined by the Court, for an Order granting Magna Defendants’ motion to dismiss the Complaint, and for such other relief as the Court deems just and proper.

PLEASE ALSO TAKE FURTHER NOTICE that pursuant to the briefing schedule jointly proposed by the parties and approved by this Court [D.I. 43], the Securities Exchange Commission's response to this motion, if any, shall be filed by June 5, 2019, and Magna Defendants' reply papers, if any, shall be filed by June 17, 2019.

DATED: May 6, 2019

By: /s/ Marjorie J. Peerce

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II, and MG Partners, Ltd.*